

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

CARRIE ROBINSON, on Behalf of Herself
and All Others Similarly Situated,

Case No. C 05-04006 CW (MEJ)

STIPULATION AND [PROPOSED] ORDER
FOR PERMANENT INJUNCTION

Plaintiff,

NCO FINANCIAL SYSTEMS, INC. and
DOES 1 through 25, inclusive,

The Honorable Claudia Wilken

Defendants.

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1 For purposes of this Stipulation and Order for Permanent Injunction, "NCO" shall mean
2 NCO Financial Systems, Inc. and any of its predecessors, successors, representatives, and agents.

3 WHEREAS, Carrie Robinson ("Plaintiff") is the named plaintiff in the above captioned class
4 action lawsuit against defendant NCO;

5 WHEREAS, on October 4, 2005, Plaintiff, filed her class action Complaint in the United
6 States District Court for the Northern District of California, entitled *Carrie Robinson v. NCO*
7 *Financial Systems, Inc.*, Case No. C 05-04006 CW (MEJ) alleging NCO violated the federal Fair
8 Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* ("FDCPA") and the Rosenthal Fair Debt
9 Collection Practices Act, Civil Code § 1788 *et seq.* (the "Rosenthal Act") by sending a form
10 collection letter, attached to the Complaint as Exhibit A.

11 WHEREAS, on November 16, 2005, NCO filed its Answer denying any and all liability
12 alleged in the Complaint.

13 WHEREFORE, IT IS HEREBY STIPULATED, by and between the parties, that the
14 following permanent injunction be entered by the Court without further notice or process:

15 1. NCO shall immediately be prohibited from sending letters identifying as a former
16 creditor "Chase Providian."

17 2. The Court shall retain jurisdiction to enter further orders as may be necessary or
18 appropriate to implement and/or enforce the provisions of this Stipulation and Order for Permanent
19 Injunction. NCO specifically consents to personal jurisdiction and venue in this Court.

20 IT IS SO STIPULATED:

21 DATED: January 16, 2007

ARLEO LAW FIRM, PLC
ELIZABETH J. ARLEO

22 
23 ELIZABETH J. ARLEO

24
25 850 Main Street, Suite 201
26 Ramona, CA 92065
Telephone: 760/ 789- 8000
760/ 789- 8081 (fax)

27
28 LAWRENCE L. SZABO
ATTORNEY AT LAW

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3608 Grand Avenue
Oakland, CA 94610
Telephone: 510/ 834-4893
510/ 834-9220 (fax)

WICKMAN & WICKMAN
STEVEN A. WICKMAN
CHRISTINA E. WICKMAN
5151 Murphy Canyon Road, Suite 100
San Diego, CA 92123-4339
Telephone: 858/ 292-9999
858/ 277-3456 (fax)

Attorneys for Plaintiff

DATED: 1/16/07

SESSIONS, FISHMAN & NATHAN
IN CALIFORNIA, LLP
DEBBIE P. KIRKPATRICK (CSB No. 207112)


DEBBIE P. KIRKPATRICK

3667 Voltaire Street
San Diego, California 92106
Telephone: 619/ 758-1891
619/ 222-3667 (fax)

ERICKSEN, ARBUTHNOT, KILDUFF,
DAY & LINDSTROM, INC.
BENJAMIN A. EMMERT
152 North Third Street, Suite 700
San Jose, California 95112-5660
Telephone: 408/ 286-0880
408/ 286-0337 (fax)

SESSIONS, FISHMAN & NATHAN, L.L.P.
DAVID ISRAEL (LSB No. 7174)
BRIAN ROTH (LSB No. 22148)
BRYAN SHARTLE (LSB No. 27640)
3850 North Causeway Blvd.
Lakeway Two, Suite 1240
Metairie, Louisiana 70002-1752
Telephone: (504) 828-3700
504/ 828-3737 (fax)

